UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION

This document relates to: 19-cv-10713 (LAK)

Consolidated Multidistrict Action

Docket No. 1:18-md-2865 (LAK)

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO ANSWER THE AMENDED COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, that the current deadline for Defendant California Catalog Company Pension Plan ("California Catalog") to answer the Amended Complaint in this action is hereby extended thirty (30) days up to and including October 28, 2020.

No provision of this Stipulation and Order shall be construed as a waiver of, and California Catalog expressly reserves, any and all defenses.

This is Defendant's fifth request for an extension of time to answer or otherwise respond to the Amended Complaint. The Court granted Defendant's first three requests and has yet to rule on its fourth request.

Dated: New York, New York September 24, 2020

LANKLER, SIFFERT & WOHL LLP

HUGHES HUBBARD & REED LLP

By: <u>/s/ Gabrielle S. Friedman</u>
Gabrielle S. Friedman

By: /s/ Marc A. Weinstein
(e-signed with consent)
Marc A. Weinstein

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Counsel for Defendant California Catalog Company Pension Plan

Counsel for Skatteforvaltningen (Customs and Tax Administration of the Kingdom of Denmark)

SO ORDERED:

/s/ Lewis A. Kaplan
Lewis A. Kaplan
United States District Judge

September 25, 2020